REMARKS

In the Office Action dated October 26, 2006, the Examiner rejects claims 2 through 4, 20, 21 and 24 as obvious under 35 U.S.C. 103(a) over U.S. Patent Publication No. 2005/0114484 to Wilson, et al. ("Wilson") in view of U.S. Patent No. 7,028,027 to Zha, et al. ("Zha"). Claims 5 and 6 are rejected as obvious over Wilson and Zha in view of U.S. Patent No. 6,941,321 to Schuetze ("Schuetze"). Claims 7, 9, 11 and 16 stand rejected as obvious over Wilson and Zha in view of U.S. Patent Publication No. 2002/0016786 to Pitkow, et al. ("Pitkow"). Claims 10, 14 and 15 stand rejected as obvious over Wilson, Zha, Schuetze, and Pitkow. Claims 12 and 19 stand rejected as obvious over Wilson, Zha and Pitkow in view of U.S. Patent No. 6,526,426 to Lakritz ("Lakritz"). Claims 17 and 18 stand rejected as obvious over Wilson, Zha and Pitkow in view of U.S. Patent No. 6,285,999 to Page ("Page") and claims 22 and 23 are rejected as obvious over Zha and U.S. Patent No. 7,031,961 to Pitkow ("Pitkow II"). Finally, the Examiner asserts that claims 8 and 13 have similar limitations as to claims 2 through 24 and are therefore rejected under the same rationale.

By way of the present Response, Applicants hereby cancel dependent claim 16 and amend independent claim 24. Applicants also herby cancel independent claims 22 and 23 without prejudice and reserve the right to pursue the canceled claims in one or more Continuation applications. No new matter has been added and the amendment is supported by the specification as originally filed.

As the Examiner recognizes and admits, neither Wilson nor Zha, either alone or in combination, teach or suggest the element of summing unique inlinking hosts and outlinking hosts in the augmented set, which by way of the present amendment is

incorporated into independent claim 24. The Examiner asserts, however, that Pitkow teaches this element; Applicants respectfully disagree. Pitkow discusses a hierarchical search system, wherein the user is able to search directly within a particular sub-category, provided they are aware of the existence of that subcategory. Pitkow ¶0113. At best, Pitkow discusses that top-level to bottom level domains are assigned with content descriptors, in an order that the hierarchical structure can be traversed, from the more general to the more specific. Pitkow ¶0113. More specifically, the portions of Pitkow upon which the Examiner relies discuss query augmentation on the basis of a query, a context and relevance feedback. Pitkow ¶103. Query augmentation, however, is unrelated to the element of summing unique inlinking hosts and outlinking hosts in the augmented set, as claimed. Accordingly, Applicants assert that independent claim 24 as amended is neither taught nor suggested by Wilson, Zha or Pitkow, either alone or in combination, and respectfully request withdrawal of the rejection regarding the same.

Applicants also assert that there is no motivation to combine Wilson and Zha with Pitkow. The rationale that the Examiner provides ("providing the user with a 'substitute' bookmark when a preferred document is unavailable (see Pitkow at al., ¶ 102)") is insufficient as independent claim 24 is directed toward a method of determining a countrytag for a website on a network. Providing the user with a substitute bookmark when a preferred document is unavailable, as the Examiner suggests, fails to provide the requisite motivation to combine Wilson, Zha and Pitkow, as this result is unrelated to determining a countrytag for a website on a network, as claimed by independent claim 24. Accordingly, Applicants respectfully request withdrawal of the rejection of

independent claim 24 as there is insufficient motivation to combine the references as the Examiner suggests.

The dependent claims of the present application contain additional features that further substantially distinguish the invention of the present application over the art of record. Given the Applicants' position regarding the patentability of the independent claims, however, it is not deemed necessary at this point to delineate such distinctions.

For at least all of the above reasons, Applicants respectfully request that the Examiner withdraw all rejections and objections, and allowance of all the pending claims is respectfully solicited. To expedite prosecution of this application to allowance, the examiner is invited to call the Applicants' undersigned representative to discuss any issues relating to this application.

Dated: February 26, 2007

I hereby certify that the correspondence attached herewith is being deposited this date with the U.S. Postal Service as First Class Mail with sufficient postage addressed to Mail Stop: RCE, Commissioner for Patents, Box 1459, Alexandria, VA 22313-1450.

Matthew L. Kaufman

2/26/2007 Date Respectfully submitted,

Lett A. O.

Seth H. Ostrow, Reg. No. 37,410

DREIER LLP 499 Park Ave.

New York, New York 10022

Tel: (212) 328-6100

Fax: (212) 328-6101

Customer No. 61834